REMARKS

The following remarks address an Advisory Action dated December 29, 2006. That Advisory Action, in turn, was issued in response to Applicant's Request for Reconsideration dated December 7, 2006. The following remarks are to be read as supplementing the more complete arguments presented in the Request of December 7, 2006.

The Applicant respectfully requests reconsideration and allowance of the present application in view of the following remarks in conjunction with the Request for Reconsideration of December 7, 2006.

Request for Continued Examination (RCE)

A Request for Continued Examination (RCE) is being filed on the same date herewith. The RCE ensures entry of this Response.

Regarding the 35 U.S.C. § 102(b) Rejection

Claims 1-12, 15, 17-36, and 48-49 are rejected under 35 U.S.C. § 102(b) as being anticipated by Altova, Inc., "XML Spy 4.0 Manual," (referred to below as "Altova" for brevity). Applicant respectfully traverses this rejection for the following reasons.

To repeat, the remarks presented in the December 7, 2006 Request are to be considered incorporated by reference herein. The following remarks are specifically directed to the comments made in the Advisory Action of December 29, 2006.

As to claim 1, the Advisory Action states in part:

Applicant's argument is not commensurate with the scope of the claimed invention. Claim 1 specifies 'modifying the translation file to include mapping functionality that can provide information regarding relationships between parts of documents . . .' The mapping functions are defined as either automatically assigned or manually assigned. See, disclosure, page 26, line 23 through page 27, line 4.

It is respectfully submitted that the broadest reasonable interpretation of automatic mappings between two files using a translation file is taught by the translation of an XML file to an HTML file through an XSLT, with the mappings being inherent in the translation due to the nature of the direct transform, which requires a knowledge of the first document in order to transform the data into a corresponding format in the second document. This is consistent with the definition of the term 'map' as understood by one of ordinary skill in the art at the time of the invention, as follows: to translate from one value into another.' See 'Microsoft computer Dictionary,' fifth edition, Microsoft Press, 2002, definition of 'map.' [See page No. 2 of the Advisory Action.]

In addressing this comment, it is useful to revisit the exact language of claim 1, reproduced below for the convenience of the Patent Office:

1. A method for mapping between parts of an input document and associated parts of an output document, the input document pertaining to a first kind of document, and the output document pertaining to a second kind of document, comprising:

providing a translation file that converts documents of the first kind to documents of the second kind;

in a first phase, modifying the translation file to include mapping functionality that can provide information regarding relationships between parts of documents of the first kind and associated parts of documents of the second kind, the first phase producing a modified translation file;

in a second phase, using the modified translation file to convert the input document into the output document, including:

activating the mapping functionality; and

using the mapping functionality to provide references in the output document that associate parts of the output document with parts of the input document.

As indicated in this claim, the method includes an operation of "providing a translation file that converts documents of the first kind to documents of the second kind." A first phase involves "modifying the translation file to include mapping functionality." The Examiner is interpreting the translation file as conventional XSLT. But conventional XSLT is sufficient in an *unmodified state* to convert from XML to HTML. This renders the Patent Office's interpretation logically inconsistent because, insofar as the translation file already produces a desired conversion result, there would be no need to further modify it to include mapping functionality. In other words, the "mapping functionality" modifies the translation file; thus, if the translation file is being interpreted as conventional XSLT, then the mapping functionality must be regarding as something above and beyond what is normally found in XSLT, rather than a conventional part of XSLT.

Moreover, claim 1 expressly recites that the mapping functionality provides "references in the output document that associate parts of the output document with parts of the input document." Conventional XSLT can convert XML to HTML, but this conversion is strictly one-way, meaning that one cannot use the resultant HTML document to map back to the original XML document. In other words, XSLT does not provide the above-described type of references in an output document.

For the above-identified reasons, the Applicant submits that independent claim 1 is not anticipated by the Altova document. While the Patent Office may indeed interpret claims in their broadest reasonable interpretation, the Applicant submits that an interpretation which runs counter to what is expressly recited in a claim is not a reasonable interpretation.

As to claim 15, the Advisory Action states, in part:

> Claim 15 specifies, in part: 'modifying the translation file to include mapping functionality that can provide information regarding relationships between parts of documents . . .' Applicant admits that an XSLT 'is conventionally used to translate from XML to HTML and therefore can be construed as one exemplary variety of a translation file.' See, Remarks, page 21. Modification of an XSLT file is taught in Altova. See, [sic] The Examiner read claim 15 in its broadest reasonable interpretation as specifying the ordinary use of an XSLT to translate the files.' [See page No. 2 of the Advisory Action.]

To address this comment, it is useful to revisit the exact language of claim 15, reproduced below:

15. (Original) A method for generating mapping functionality that can map between parts of an input document and associated parts of an output document, the input document pertaining to a first kind of document, and the output document pertaining to a second kind of document, comprising:

providing a translation file that converts documents of the first kind to documents of the second kind; and

modifying the translation file to include mapping functionality that can provide information regarding relationships between parts of documents of the first kind and associated parts of documents of the second kind.

Claim 15 does not read on conventional XSLT for similar reasons to those set forth above with respect to claim 1. First, the "mapping functionality" modifies the translation file. If the translation file is being interpreted as conventional XSLT, then the mapping functionality must be regarding as something above and beyond what is normally found in XSLT, rather than a conventional part of XSLT. Second, the mapping functionality is said to "provide information regarding relationships between parts of documents of the first kind and associated parts of documents of the second kind." While XSLT may convert XML to HTML, it does not provide information regarding relationships in the manner being recited. Further, as set forth in the December 7, 2006 Request, Altova does not disclose the subject matter recited in claim 15.

For the above-identified reasons, the Applicant submits that independent claim 15 is not anticipated by the Altova document.

Finally, with respect to claim 31, the Advisory Action states in part:

Again, Applicant admits that an XSLT is conventionally used to translate from XML to HTML, and the Examiner read the claim in the its broadest reasonable interpretation as specifying the usual translation functions. See, Remarks, page 22. [See page No. 2 of the Advisory Action.]

Claim 31 is reproduced below for ease of reference:

31. A computer readable medium having stored thereon an information structure, comprising:

a plurality of translation elements configured to convert a first kind of document into a second kind of document; and

a plurality of functions interspersed amongst the plurality of translation elements, the plurality functions configured to provide a respective plurality of references, wherein the references provide pointers that link parts of the second kind of document with parts of the first kind of document.

Conventional XSLT can convert XML to HTML, but conventional XSLT does not include "a plurality of functions interspersed amongst the plurality of translation elements, the plurality functions configured to provide a respective plurality of references, wherein the references provide pointers that link parts of the second kind of document with parts of the first kind of document." As described above, conventional XSLT provides a one-way conversion, and, as such, does not provide the type of pointers recited in claim 31.

For the above-identified reasons, the Applicant submits that independent claim 31 is not anticipated by the Altova document.

The remainder of the previously-pending claims distinguish over the Altova document for reasons set forth in the December 7, 2006 Request, which are incorporated by reference herein.

The present Response also adds new claims 50-59. These claims depend directly or indirectly from independent claim 1, and are allowable for at least this reason. Further, these claims recite additional subject matter which further distinguishes these claims over the Altova document. (Note that an equal number of dependent claims has been canceled to avoid payment of additional claim fees.)

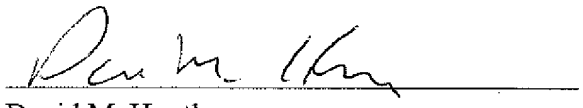
For at least the above-identified reasons, the Applicant respectfully requests the Patent Office to remove the 35 U.S.C. § 102 rejection based on Altova.

Conclusion

The arguments presented above are not exhaustive; Applicant reserves the right to present additional arguments to fortify its position. Further, Applicant reserves the right to challenge the prior art status of one or more documents cited in the Office Action.

In conclusion, all objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance and such allowance is respectfully solicited. The Examiner is urged to contact the undersigned if any issues remain unresolved by this Amendment.

Respectfully Submitted,

Dated: 3-8-3007 By: 

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